

# EXHIBIT B

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UBER TECHNOLOGIES, INC.;  
RASIER, LLC; and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF JENNIFER  
HANDLEY IN SUPPORT OF  
DEFENDANTS' MARCH 10, 2025 BRIEF  
PURSUANT TO SPECIAL MASTER  
ORDER NO. 2, § III(6)**

This Document Relates to:  
  
ALL ACTIONS

**DECLARATION OF JENNIFER HANDLEY**

I, Jennifer Handley, having personal knowledge of the following state:

1. I am the Senior Legal Director, Global Safety, at Uber. I was first employed by Uber in December 2018 and have worked as in-house counsel for the past 6 years. My previous roles include Senior Counsel, Safety and Legal Director, Safety. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and employees related to safety issues, procedures, and policy, among other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's March 10, 2025 brief pursuant to Special Master Order No. 2, § III(6) (ECF 2357). The facts set forth herein are true and correct and are based on my own personal knowledge, and I could and would competently testify thereto if called.

2. I am familiar with the document referenced in the privilege log as JCCP\_MDL\_PRIVLOG000984. It is a document that is marked "Attorney-Client Privileged and Confidential/Work Product Conducted at the Direction of Jen Handley." This document is a draft memorandum analyzing safety-related Key Performance Indicators ("KPIs") for 2018 and 2019. I requested that this information be compiled so that I and other in-house lawyers might provide legal counsel regarding Uber's development and uses of KPIs related to safety.

3. I am familiar with the document referenced in the privilege log as JCCP\_MDL\_PRIVLOG000995. It is a document that is marked "Attorney-Client Privileged and Confidential/Work Product Conducted at the Direction of Jen Handley." This document is a draft memorandum analyzing rates of certain safety-related incidents for 2017 Q4 and 2018. As part of my role as in-house counsel for Uber, I provide the company legal advice concerning safety issues, including Uber's safety KPIs. I requested that this information be compiled to assist in the provision of legal counsel for the development of our safety KPIs.

4. I am familiar with the document referenced in the privilege log as JCCP\_MDL\_PRIVLOG001123. It is a spreadsheet analyzing incident and healing data for JIRA tickets for the years 2016-2018 by categories. I provide the company legal advice concerning safety

1 issues, including on safety incident data. Several of the tabs are marked “Work Product” because they  
2 were compiled at my request so that I might provide legal advice on the company’s handling of certain  
3 categories of reported incidents.

4 5. I am familiar with the documents identified in the privilege log as  
5 JCCP\_MDL\_PPRIVLOG019001 and JCCP\_MDL\_PRIVLOG019002. Both are redacted email  
6 threads including an email from then-Software Engineer II Emad Khan, passing on a report of sexual  
7 harassment by riders and issues with the Uber platform. In the redacted email dated December 5, 2019,  
8 then-Senior Legal Program Manager Laura Alioto responds to Emad Khan regarding the investigation  
9 into the driver’s claims. Laura Alioto’s response to Emad Khan describes legal advice that originated  
10 from me and other members of Uber’s in-house legal team on how such claims should be investigated  
11 and handled.

12 6. I am familiar with the document identified on Uber’s privilege log as  
13 JCCP\_MDL\_PRIVLOG043613. It is an internal memorandum outlining Uber’s response strategy to  
14 a proposed mandatory reporting ordinance. This document was drafted in anticipation of the litigation  
15 that could occur as a result of the approval of the ordinance. The memorandum memorializes advice  
16 that I and the members of the legal team, including colleagues from the Regulatory and Litigation  
17 teams, provided regarding legal action that would be necessitated by implementation of the ordinance.

18 I declare under penalty of perjury that the foregoing is true and correct.  
19 Executed in Portland, Oregon on March 10, 2025.

20 By: Jennifer Handley

21 Jennifer Handley  
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